

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CRYSTALLEX INTERNATIONAL
CORPORATION,

Plaintiff,

v.

BOLIVARIAN REPUBLIC
OF VENEZUELA,

Defendant.

C.A. No. 17-mc-151-LPS

**CRYSTALLEX INTERNATIONAL CORPORATION'S RESPONSE TO
RED TREE'S MOTION FOR AN ORDER ENTERING A DISCOVERY SCHEDULE**

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Dated: May 28, 2025

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Pursuant to this Court's Order, D.I. 1769, Crystallex respectfully submits this Response to Red Tree's Motion for an Order Entering a Discovery Schedule, D.I. 1756.

Crystallex submits that the discovery that Red Tree's proposed schedule contemplates far exceeds what this Court authorized in its December 31, 2024 Order, D.I. 1517, or what is reasonable for a judicial sale. However, so long as the entities that would be engaged in the proposed discovery have fully consented, and such discovery and any related briefing will not delay the sale hearing scheduled for July 22, 2025, Crystallex takes no position on Red Tree's proposed discovery schedule.

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/s/ Travis S. Hunter

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